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Attorney for Plaintiff and Counter-Defendant Andrew Sawyer

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION, et.	)	Case no. 4:16 CV 2163 CDP
al.,	)	
	)	
Plaintiffs and Counter-Defendants,	)	DEFENDANT ANDREW SAWYER'S
	)	RESPONSES TO COUNTERCLAIM
vs.	)	PLAINTIFF'S INTERROGATORIES TO
	)	COUNTERCLAIM DEFENDANT ANDREW
	)	SAWYER; VERIFICATION
PEOPLE FOR THE ETHICAL TREATMENT	)	
OF ANIMALS, INC., et. al.,	)	
	)	
Defendant and Counter-Plaintiff.	)	
	)	
	)	
	)	

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff and Counter-Defendant Andrew Sawyer ("Sawyer"), by and through counsel, hereby states his responses and objections to Defendant and Counter-Plaintiffs' Counterclaim Plaintiff People For The Ethical Treatment Of Animals' Interrogatories To Counterclaim Defendant Andrew Sawyer as follows:

GENERAL OBJECTIONS

The following General Objections apply to every paragraph of the interrogatories:

1. Counter-Defendant objects to any interrogatory that calls for privileged information, including, without limitation, information protected by the attorney-client privilege.

2. Counter-Defendant objects to any interrogatory that calls for information prepared in anticipation of litigation or for trial absent a showing of substantial need by Counter-Plaintiffs.

3. Counter-Defendant objects to any interrogatory that calls for the production of any information containing or reflecting the mental impressions, conclusions, opinions and/or legal theories of any attorney for Counter-Defendant, on the grounds that such information is protected by the attorney work product doctrine.

4. Counter-Defendant objects to any interrogatory that is overly broad, unduly burdensome, harassing, duplicative or which requests information already in the possession of Counter-Plaintiffs or which can be easily accessed by Counter-Plaintiffs without undue expense or trouble.

5. Counter-Defendant objects to any interrogatory that calls for information which is neither relevant to the subject matter of the pending Complaint nor reasonably calculated to lead to the discovery of admissible evidence in connection with the pending Complaint.

6. Counter-Defendant objects to any interrogatory, and to every "definition" that seeks to impose obligations beyond those required by the Federal Rules of Civil Procedure, as reasonably interpreted and supplemented by local court rules.

7. Counter-Defendant reserves all objections as to the competence, relevance, materiality, admissibility, or privileged status of any information provided in response to these Interrogatories, unless Counter-Defendant specifically states otherwise.

8. Counter-Defendant objects to any interrogatory to the extent it seeks information from former directors, officers, employees, agents, partners, representatives, and attorneys of Counter-Defendant, which such persons are not under the control of Counter-Defendant.

9. Counter-Defendant objects to any interrogatory to the extent it seeks disclosure of proprietary and/or confidential business information of any business or operation.

10. Counter-Defendant's general objections are applicable to, and included in, all specific objections and responses set forth below.

#### SPECIFIC RESPONSES

##### Interrogatory No. 1:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

##### Interrogatory No. 2:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

##### Interrogatory No. 3:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

##### Interrogatory No. 4:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as

pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 5:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 6:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 7:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 8:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 9:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 10:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 11:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 12:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 13:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as

pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 14:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 15:

Counter-defendant Sawyer consulted with counsel in responding to these interrogatories. No substantive information was provided in connection with these interrogatories so the balance of the interrogatory is inapplicable.

Interrogatory No. 16:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 17:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

Interrogatory No. 18:

In response to this interrogatory, Counter-defendant Sawyer invokes his rights against

self-incrimination pursuant to the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the US Constitution, as well as pursuant to Article 1, Section 19 of the Missouri Constitution, and on that basis objects to and will not provide the information sought.

DATED: June 14, 2018

GEORDIE DUCKLER, P.C.

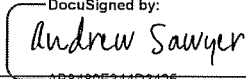
By: s/ *Geordie Duckler*  
Geordie Duckler, OSB #873780  
Attorney for Plaintiff and Counter-  
Defendant Andrew Sawyer

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Attorney for Plaintiff and Counter-Defendant Andrew Sawyer

VERIFICATION OF INTERROGATORY ANSWERS

I believe, based on reasonable inquiry, that the foregoing answers are true and correct to the best of my knowledge, information and belief. I verify under penalty of perjury that the foregoing is true and correct.

DATED: June 14th, 2018

By:   
AB8489F344D3425...  
Andrew Sawyer

1 **CERTIFICATE OF SERVICE**

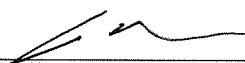
2 I certify that on the 15<sup>th</sup> day of June, 2018, the DEFENDANT ANDREW SAWYER'S  
3 RESPONSES TO COUNTERCLAIM PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION  
4 OF DOCUMENTS; VERIFICATION; and DEFENDANT ANDREW SAWYER'S  
5 RESPONSES TO COUNTERCLAIM PLAINTIFF'S INTERROGATORIES TO  
6 COUNTERCLAIM DEFENDANT ANDREW SAWYER; VERIFICATION were served via  
7 U.S. mail and via e-mail to the following:  
8

9 Martina Bernstein, [MartinaB@petaf.org](mailto:MartinaB@petaf.org)  
10 Marissa Lauren Curran, [mcurran@polsinelli.com](mailto:mcurran@polsinelli.com)  
11 Jared S. Goodman, [JaredG@petaf.org](mailto:JaredG@petaf.org)  
12 James P. Martin, [jmartin@polsinelli.com](mailto:jmartin@polsinelli.com)  
13 Kelly J. Muensterman, [kmuensterman@polsinelli.com](mailto:kmuensterman@polsinelli.com)  
14 *Attorneys for Defendants/Counter-Claimants*  
15 *People for the Ethical Treatment of Animals, Inc.*  
16 *and Angela Scott*

17 DATED this 15<sup>th</sup> day of June, 2018

18 **GEORDIE DUCKLER, P.C.**

19 By:

20   
21 \_\_\_\_\_  
22 Georgie Duckler, OSB No. 873780  
23 Attorney for Plaintiff/Counter-Defendant  
24 Andrew Sawyer  
25  
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